

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

VS.

NOTICE OF MOTION
19-cr-106

JEFFREY RICHARDS

Defendant

MOTION BY:

Michael J. Stachowski, Esq.
Attorney for Jeffrey Richards

PLACE:

Before the Honorable Michael J. Roemer,
2 Niagara Square, Buffalo, NY 14202

SUPPORTING PAPERS:

Affirmation of Michael J. Stachowski, Esq.
Dated September 13, 2019

RELIEF REQUESTED:

For the Court to vacate government's motion to set
date for trial or change plea and allow late filing of pre-
trial motions

DATED: Buffalo, New York,
September 13, 2019

Respectfully Submitted,

S/Michael J. Stachowski
MICHAEL J. STACHOWSKI, ESQ.
MICHAEL J. STACHOWSKI, P.C.
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TO: Brendan T. Cullinane
United States Attorney
Seth T. Milisani
Assistant United States Attorney

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

VS.

ATTORNEY AFFIRMATION

JEFFREY RICHARDS

Defendant

STATE OF NEW YORK)
COUNTY OF ERIE) SS:

MICHAEL J. STACHOWSKI, ESQ., under penalty of perjury, states:

1. I represent the defendant, Jeffrey Richards, in the above entitled action brought by the United States of America and as such am familiar with the facts and circumstances of the case.
2. That reply motions were due on Thursday, September 12, 2019.
3. I have been working on two very involved appeals with lengthy court appearances and voluminous transcripts for the Court of Appeals, both which were due on Friday, September 12, 2019, the same date the pre-trial motions were due in this matter.
4. Additionally, I started a three week long trial in Federal Court today, September 9, 2019 that is expected to run through September 27, 2019. While I had been preparing the appellant briefs and records, I have been preparing for this trial as well.
5. I apologize to the Court for an inconvenience and ask that the defendant not be penalized for lack in prioritizing these matters in a more effective way.

WHEREFORE, on behalf of defendant, Jeffrey Richards, in the interest of justice, it is respectfully request that the Court vacate the motion made by the Assistant United States Attorney and grant the late filing of motions.

S/Michael J. Stachowski

MICHAEL J. STACHOWSKI, ESQ.

MICHAEL J. STACHOWSKI, P.C.

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